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*Attorneys for Tecumseh–Infinity Medical
Receivable Fund, LP*

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEVADA**

In re:

INFINITY CAPITAL MANAGEMENT,
INC.

Debtor.

HASELECT-MEDICAL RECEIVABLES
LITIGATION FINANCE FUND
INTERNATIONAL SP,

Plaintiff,

v.

TECUMSEH-INFINITY MEDICAL
RECEIVABLES FUND, LP,

Defendant.

Case No. 21-14486-abl
Chapter 7

Adversary Case No. 21-01167-abl

**STIPULATION TO EXTEND
DISCOVERY DEADLINES AND
CONTINUE TRIAL
(FOURTH REQUEST)**

Pretrial Conference

New Date: August 8, 2023

New Time: 10:30 a.m.

Trial

New Dates: August 24, 25, 28, 29, and 31, 2023

New Time: 9:30 a.m.

TECUMSEH-INFINITY MEDICAL
RECEIVABLES FUND, LP,

Counter-Claimant,

v.

HASELECT-MEDICAL RECEIVABLES
LITIGATION FINANCE FUND
INTERNATIONAL SP,

Counter-Defendant.

HASELECT-MEDICAL RECEIVABLES
LITIGATION FINANCE FUND
INTERNATIONAL SP,

Counter-Claimant

v.

TECUMSEH-INFINITY MEDICAL
RECEIVABLES FUND, LP,

Counter-Defendant.

**STIPULATION TO EXTEND DISCOVERY DEADLINES AND CONTINUE
TRIAL DATE (FOURTH REQUEST)**

Tecumseh-Infinity Medical Receivables Fund, LP (“Tecumseh”), by and through its undersigned counsel, and HASElect-Medical Receivables Litigation Finance Fund International SP (“HASElect”), by and through its undersigned counsel (each a “Party” and, collectively, the “Parties”), hereby agree and stipulate, pursuant to Local Rule 7026, to extend discovery deadlines as follows:

A. Discovery Completed

The following discovery has been completed:

1. On or about January 12, 2022, HASElect served a subpoena on nonparty Three Bell Capital.
2. On or about January 12, 2022, HASElect served a subpoena on nonparty Jonathan

1 Porter.

2 3. On or about January 17, 2022, Tecumseh served its Initial Disclosures pursuant to
3 FRCP 26 on HASelect.

4 4. On or about January 18, 2022, HASelect served its Initial Disclosures pursuant to
5 FRCP 26 on Tecumseh.

6 5. On or about March 10, 2022, HASelect served its First Set of Interrogatories and
7 Requests for Production on Tecumseh.

8 6. On or about March 29, 2022, Tecumseh served its First Set of Requests for
9 Production on HASelect.

10 7. On or about April 18, 2022, Tecumseh served its Responses to HASelect's First Set
11 of Interrogatories and Requests for Production.

12 8. On or about May 18, 2022, HASelect served its Responses to Tecumseh's First Set
13 of Requests for Production.

14 9. On or about August 29, 2022, Tecumseh served its First Set of Interrogatories and
15 Requests for Admission as well as its Second Set of Requests for Production on HASelect.

16 10. On or about September 9, 2022, HASelect served its deposition notice for the
17 deposition of Tecumseh.

18 11. On or about September 9, 2022, HASelect served deposition subpoenas on various
19 nonparties.

20 12. On or about September 28, 2022, HASelect served its Responses to Tecumseh's First
21 Set of Interrogatories and Requests for Admission as well as its Second Set of Requests for
22 Production.

23 13. On or about November 28, 2022, Tecumseh served its Third Set of Requests for
24 Production on HASelect.

25 14. On or about December 2, 2022, Tecumseh served its Subpoena to Produce
26 Documents to GPMicro, Inc.

27 15. On or about December 28, 2022, HASelect served deposition subpoenas on various
28 nonparties.

1 16. On or about December 28, 2022, HASelect served its Responses to Tecumseh's Third
2 Set of Request for Production.

3 17. On or about January 5, 2023, Tecumseh served deposition subpoenas on HASelect
4 and other various nonparties.

5 18. On or about February 16, 2023, HASelect served its First Supplemental Response to
6 Tecumseh's Third Set of Requests for Production and First Supplemental Disclosures.

7 19. On or about February 17, 2023, Tecumseh served its First Supplemental Disclosures.

8 20. On or about March 14, 2023, Tecumseh served its Second Supplemental Disclosures.

9 21. The depositions of Anne Pantelas and Oliver Hemmers, principals for the debtors,
10 are scheduled for March 27, and 28, 2023, respectively.

11 **B. Discovery Remaining**

12 Discovery in this case has been ongoing and additional discovery remains to be completed,
13 including, but not limited to:

- 14 1. Depositions of each party or the party's representative(s);
- 15 2. Depositions of various third parties;
- 16 3. Responses to outstanding written discovery;
- 17 4. Supplementation of prior written discovery;
- 18 5. Meet and confer regarding allegedly deficient discovery responses; and
- 19 6. Possible motion practice regarding allegedly deficient discovery responses.

20 The Parties reserve their right to take additional depositions based on information disclosed
21 in produced documents or obtained in the depositions the Parties have identified.

22 **C. Reasons Why Discovery Will Not Be Completed Within the Time Limit of the Existing**
23 **Deadlines**

24 This case is complex and involves thousands of accounts receivable purchased from more
25 than 100 different medical providers. While this Court has already ruled on some of the issues
26 regarding a subset of the accounts receivable at issue, other accounts receivable remain that require
27 further discovery and analysis. The Parties have worked diligently by engaging in discovery from
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1 the outset of this case, but the extent of the documents produced in this matter are voluminous and
2 require additional time for review. In fact, the parties have only recently exchanged tens of
3 thousands of additional documents requiring review and analysis. Further, the parties have worked
4 extensively to schedule third party depositions that are critical to the claims and defenses of this
5 case; however, scheduling those depositions has been difficult. Those depositions are now scheduled
6 to proceed at the end of March 2023. As a result, the party depositions, which have been noticed,
7 will need to be pushed back.

8 The Parties believe that, given the situation as it presently exists, discovery cannot be
9 accomplished by the represented deadlines in the Order Granting the Parties' Stipulation to Extend
10 Discovery Deadlines (Third Request) on file herein [ECF No. 175]. This fourth stipulation to extend
11 the existing discovery deadlines is brought in good faith and not for the purpose of delay. Based on
12 the information presented in this Stipulation, the Parties believe that good cause exists to extend
13 discovery as proposed in order to permit the Parties to ensure that discovery is conducted in a
14 thorough manner.

15 **D. Proposed Agreement and Amended Discovery Schedule**

16 Based on the foregoing, and other good valuable consideration, the receipt and sufficiency
17 of which are acknowledged, the Parties stipulate and agree as follows, subject only to entry of the

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 proposed order by this court approving this Stipulation, substantially in the form attached hereto
 as **Exhibit A**:

1. The Parties agree to extend the discovery deadlines as follows:

Event Deadline	Current Date	Proposed Date
Close of Fact Discovery	3/30/2023	6/30/2023
Dispositive Motion Deadline	5/1/2023	8/1/2023
Final List of Witnesses and Exhibits	5/15/2023	8/15/2023
Expected trial ready date	5/30/2023	8/24/2023

2. This matter is presently scheduled to go to trial beginning on May 30, 2023. The extension of discovery deadlines requested herein will require a continuance of this trial date.

IT IS SO STIPULATED.

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